

EXHIBIT B



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Firearms Technology Industry Services Branch

Martinsburg, WV

www.atf.gov

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907010 (b) (6)
3311/307751

Mr. Jordan Vinroe
JSD Supply
106 Poplar Lane
Portersville, PA 16051

Dear Mr. Vinroe:

This refers to your correspondence to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB), which accompanied your submitted sample of one metal "Pre-Cursor" SIG SAUER P320 pistol frame. Specifically, you requested an evaluation and classification for this sample.

As background, the amended Gun Control Act of 1968, 18 U.S.C. § 921(a)(3), defines the term "firearm" to include *any weapon (including a starter gun) which will or is designed to or may be readily converted to expel a projectile by the action of an explosive...[and]...the frame or receiver of any such weapon....*

Note: FTISB uses the following terms to describe certain items:

The term "receiver-blank" is used to describe forgings, castings, or machined bodies (defense articles) such as AR-15 receiver castings, AK receiver flats, etc. in various stages of folding/machining which are not classified as firearms.

The term "incomplete receiver" is used to describe a receiver which may be classified as a firearm, but is not completely machined for use as a functional firearm receiver.

Please note that any receiver-casting or receiver-blank that has been finished to the point at which it can be recognized as a firearm frame or receiver is a "firearm."

Ms. Jordan Vinroe

With respect to markings, please note that 27 CFR § 478.92 states the following:

...each licensed manufacturer or licensed importer of any firearm manufactured or imported shall legibly identify each such firearm by engraving, casting, stamping (impressing), or otherwise conspicuously placing or causing to be engraved, cast, stamped (impressed) or placed on the frame or receiver thereof in a manner not susceptible of being readily obliterated, altered, or removed, an individual serial number not duplicating any serial number placed by the manufacturer or importer on any other firearm, and by engraving, casting, stamping (impressing), or otherwise conspicuously placing or causing to be engraved, cast, stamped (impressed), or placed on the frame or receiver, or barrel thereof in a manner not susceptible of being readily obliterated, altered or removed, the model if such designation has been made; the caliber or gauge; the name (or recognized abbreviation of same) of the manufacturer and also, when applicable, of the importer; in the case of a domestically made firearm, the city and State (or recognized abbreviation thereof) wherein the licensed manufacturer maintains its place of business; and in the case of an imported firearm, the name of the country in which manufactured and the city and State (or recognized abbreviation thereof) of the importer.

Furthermore, for firearms manufactured or imported on and after January 30, 2002, the engraving, casting, or stamping (impressing) of the serial number must be to a minimum depth of .003 inch and a minimum height of 1/16 inch. All other markings must be of a minimum depth of .003 inch.

Results of the FTISB examination of the submitted item, fully identified below, is as follows:

Folded SIG SAUER, Model P320, semiautomatic pistol frame.

- Overall Length - 4-5/16 inches.
- Height - 1-1/8 inch.
- Frame Construction - Alloy 316 (CF8M).

Right side view



Left side view



Ms. Jordan Vinroe

Bottom view



Top view



The sample is already formed into shape to drop into place; however, the rails have not been made into the final position for use in a completed firearm. The sample is lacking all holes for the following parts: the trigger pin hole, trigger stop pin, sear housing roll pin, sear pivot pin, takedown lever, slide catch lever pin, and safety lever pin.

The submitted sample has not reached a point in the manufacturing process that it would be classified as a "firearm" as defined by the GCA.

The sample will be returned with the pre-paid shipping label you provided.

We trust that the foregoing has been responsive to your request for an evaluation. If we can be of any further assistance, please contact us.

Sincerely yours,

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Michael R. Curtis
Chief, Firearms Technology Industry Services Branch